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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

REGINA CASTRO,

Plaintiff,

vs.

COUNTY OF LOS ANGELES, CHAD
MELTON, and DOES 1-10, inclusive,

Defendants.

Case No.: 2:23-cv-02810-WLH-MARx

[Honorable Wesley L. Hsu]
Magistrate Judge Margo A. Rocconi

**RESPONSE TO OSC AND
STIPULATION TO CONTINUE
OSC RE DISMISSAL**

OSC re Dismissal:
Date: March 22, 2024
Time: 1:00 p.m.

Proposed Cont. OSC re Dismissal:
Date: January 17, 2025
Time: 1:00 p.m.

1 IT IS HEREBY STIPULATED by and between Plaintiff, REGINA CASTRO
 2 and Defendants, COUNTY OF LOS ANGELES, and CHAD MELTON, by and
 3 through their counsel of record, to continue the OSC re Dismissal currently
 4 scheduled for March 22, 2024 (see Dkt. 45), to January 17, 2025, subject to
 5 approval by the Court. The parties submit that, as outlined below, GOOD CAUSE
 6 exists for this continuance.

- 7 1. The Parties participated in a mediation on December 15, 2023, with mediator
 8 Judge Joseph Biderman (Ret.).
- 9 2. Following the mediation, the parties reached a tentative settlement and have
 10 signed the appropriate agreement to initiate the County's approval process.
 11 The settlement is subject to the County's approval process, which entails final
 12 approval by the Contract Cities Claims Board and the County of Los Angeles
 13 Board of Supervisors. The County estimates that the approval process will
 14 take approximately nine months.
- 15 3. If the Settlement is approved, the Parties will file a stipulation to dismiss the
 16 entire action with prejudice within ten days of Plaintiff's receipt of the
 17 settlement funds.
- 18 4. Therefore, the Parties respectfully request the Court continue the OSC re
 19 Dismissal from March 22, 2024 to January 17, 2025 and further respectfully
 20 request the Court to maintain jurisdiction over the case pending the approval
 21 of the settlement.

22 IT IS SO STIPULATED.

23
 24 DATED: March 6, 2024

LAW OFFICES OF DALE K. GALIPO

25
 26 By: /s/ Shannon J. Leap

27 Dale K. Galipo, Esq.

28 Marcel F. Sincich, Esq.

Shannon J. Leap, Esq.¹
Attorneys for Plaintiff REGINA CASTRO

DATED: March 6, 2024

CARPENTER, ROTHANS & DUMONT

/s/ Jill Williams

By: _____

Jill Williams

Scott J. Carpenter

Attorneys for Defendant COUNTY OF LOS
ANGELES

DATED: March 6, 2024

SEKI, NISHIMURA & WATASE, LLP

By: /s/ Janet L. Keuper _____

Janet L. Keuper

Attorneys for Defendant CHAD MELTON

¹ I, Shannon Leap, hereby attest that all the signatories listed, and on whose behalf the filing is submitted, concur in the content of this Response and Stipulation and have authorized its filing.